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10 Attorneys for Defendants, **COUNTY OF LOS ANGELES and LOS ANGELES**  
11 **SHERIFFS' DEPARTMENT**

12 **UNITED STATES DISTRICT COURT**  
13 **CENTRAL DISTRICT OF CALIFORNIA**

14 **SHELDON LOCKETT**

15 *Plaintiff*

16 vs.

17 **COUNTY OF LOS ANGELES, a**  
18 **public entity; LOS ANGELES**  
19 **COUNTY SHERIFF'S**  
20 **DEPARTMENT; a law enforcement**  
21 **agency; former SHERIFF JIM**  
22 **MCDONNELL; MIZRAIN ORREGO,**  
23 **a Deputy Los Angeles County Sheriff;**  
24 **SAMUEL ALDAMA, a Deputy Los**  
25 **Angeles County Sheriff; and DOES 1**  
26 **through 100, inclusive,**

27 *Defendants.*

28 **CASE NO.: 2:18-cv-5838-PJW**  
**Complaint Filed: July 9, 2018**

**DECLARATION OF DAVIDA M.**  
**FRIEMAN IN SUPPORT OF**  
**DEFENDANTS' OPPOSITION TO**  
**PLAINTIFF'S MOTION TO**  
**BIFURCATE ISSUES OF**  
**LIABILITY AND DAMAGES AT**  
**TRIAL**

**Date:** November 15, 2021  
**Time:** 3:00 p.m.  
**Judge:** Hon. Dale S. Fischer  
**Courthouse:** First Street Courthouse  
350 West 1<sup>st</sup> Street,  
Los Angeles, CA  
**Courtroom:** 7D

**Trial:** December 14, 2021  
**Time:** 8:30 a.m.

**DECLARATION OF DAVIDA M. FRIEMAN**

I, Davida M. Frieman, declare as follows:

1. I am an attorney licensed to practice law in the State of California and admitted to this Court. I am an attorney at the law firm of Ivie McNeill Wyatt Purcell & Diggs, counsel of record for Defendant County of Los Angeles (“COLA”). I make the following declaration based upon my personal knowledge and if asked to testify I could and would testify to the following facts.
2. This declaration is made in support of Defendants’ Opposition to Plaintiff’s Motion to Bifurcate Issues of Liability and Damages at Trial.
3. Attached hereto as **Exhibit 1** is a true and correct copy of page 8 from the Psychological Consultation Report regarding Plaintiff dated June 9, 2020, written by the Plaintiff’s psychological expert Dr. Michelle Cooley-Strickland.
4. Attached hereto as **Exhibit 2** is a true and correct copy of page 9 from the Psychological Consultation Report regarding Plaintiff dated June 9, 2020, written by the Plaintiff’s psychological expert Dr. Michelle Cooley-Strickland.
- 5.

I declare under penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct.

Executed this 25<sup>th</sup> day of October , 2021, at Los Angeles, California.

By: /s/Davida M. Frieman  
**DAVIDA M. FRIEMAN, Esq.**